UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

June 23, 2005

B-19J

Judi Perez, Forest Planner
Hoosier National Forest
811 Constitution Avenue
Bedford, Indiana 47421

Re: **Draft Environmental Impact Statement for the Proposed Land and Resource Management Plan for the Hoosier National Forest, Brown, Crawford, Dubois, Jackson, Lawrence, Martin, Monroe, Orange, and Perry Counties, Indiana EIS No. 20050114**

Dear Ms. Perez:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Draft Environmental Impact Statement (EIS) and the Proposed Land and Resource Management Plan (Forest Plan) for the Hoosier National Forest (Forest) in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA). We are pleased to have this opportunity to add U.S. EPA's suggestions to the planning effort for the Forest.

Located in southern Indiana, the Forest consists of approximately 199,150 acres of closed canopy hardwood forests, forest openings, cave and karst ecosystems, barrens, cliffs, riparian habitat, and early successional forested stands. There is a mix of public and private lands within the Forest's proclamation boundary. The Forest is managed under the multiple use concept, providing for the conservation and wise use of natural resources.

Several issues identified as important to forest planning and the need for change include watershed health, ecosystem sustainability, and recreation management. The U.S. Forest Service (USFS) evaluated five alternatives in the Draft EIS for revision of the Forest Plan. The five alternatives address these issues in a variety of ways such that each would meet the stated purpose and need. The Preferred Alternative, Alternative 5, emphasizes restoration removal of non-native pine species and restoration of oak-hickory vegetation, while meeting species viability needs. This alternative is similar to the existing Forest Plan, but adds features such as a 13,000-acre area focused on providing early successional forest habitat for the suite of species dependent on that habitat type.

This planning effort is timely and critical to the continued health of the Forest. The Forest remains among the few areas capable of maintaining plant and animal diversity on a landscape scale while providing recreational opportunities to satisfy the growing public demand for outdoor recreational experiences in natural settings. Because of these demands upon the Forest, the U.S. EPA supports the preferred alternative identified in the Draft EIS. The preferred alternative

appears to strike a balance between conservation of the species found on the Forest and wise use. Specifically, the U.S. EPA would like to commend the USFS for recognizing the importance of restoring an oak-hickory composition. Additionally, by focusing management activities for early successional habitat into a newly-created management area, late successional habitat will not be affected by further fragmentation.

Based on our review of the two documents, we have assigned a rating of **EC-2** (**Environmental Concerns-Insufficient Information**) to the Draft EIS and the proposed LARMP. A summary of the rating system used in the evaluation of these documents is enclosed for your reference. We offer the following comments on the Draft EIS for consideration during development of the Final EIS and the final Forest Plan.

Management for early- and late-successional habitat

We recommend further justification be included in the Final EIS to support proposed management activities pertaining to these two seral stages. We believe it would be useful to include additional information pertaining to Neotropical migratory bird species (NTMB), many of which have declined during the past 50 years, as a benchmark for the necessity to manage these seral stages.

We suggest the following details be included in the Final EIS: 1) population trends for NTMB on their breeding grounds; 2) tract size needed to maintain viable populations, particularly for area sensitive, forest interior species; 3) whether appropriately-sized tracts of suitable habitat currently exist, how many tracts, and where they are located on the Forest; and 4) possible reasons for population declines. Examining several NTMB (covering other principal habitat types found on the Hoosier) in addition to the Management Indicator Species should support the DEIS conclusion that proposed management is consistent with the goal of maintaining species viability for both early- and late-successional NTMB species on the Forest, which is a major breeding area within the State of Indiana.

Conversion of non-native pines to native hardwoods

Pines were planted from the 1930's until the mid-1980's to control erosion. Pine communities consist of a closed canopy and a forest floor which is virtually devoid of plant species. Conversion of this plant community to native hardwoods is beneficial to forest diversity.

Pine removal in Alternatives 3 and 4 would be accelerated in the first three decades by removing entire stands and not just portions of stands to reduce the likelihood of pine seedlings re-establishing in those stands. Alternative 4 would provide the greatest amount of conversion. We recommend the Final EIS include a discussion of the reasons for selecting Alternative 5 over

either Alternative 3 or 4 in terms of the quantity of pine to be removed under the proposed Forest Plan. In particular, we suggest the following question should be answered in the ROD: will the acreage converted to hardwoods under the preferred alternative constitute the most prudent management approach, from an ecological standpoint? This information would provide a more complete analysis of the benefits and detriments associated with the preferred alternative for the NEPA process.

Restoration of oak-hickory habitat

Similar to the above comment, we recommend the Final EIS include a discussion of the reasons for selecting Alternative 5 over either Alternative 3 or 4 in terms of the use of prescribed fire in conjunction with harvest to increase oak-hickory regeneration, a fire-dependent ecosystem. Without management for these shade-intolerant tree species, a shift in forest composition has implications for many wildlife species that depend on oak and hickory species for suitable habitat and for mast production.

Alternatives 3 and 4 propose the greatest use of prescribed fire and harvest resulting in the largest acreage of oak-hickory habitat. Again, Alternative 4 would provide for the greatest amount of oak-hickory regeneration. We recommend the Final EIS include a discussion of the reasons for selecting Alternative 5 over either Alternative 3 or 4 in terms of the amount of prescribed fire and harvest to be used as a tool for purposes of regeneration. Again, we suggest the following question should be answered in the ROD: will the acreage regenerated to oak/hickory under the preferred alternative constitute the most prudent management approach, from an ecological standpoint? An analysis of the benefits and detriments associated with this management selection over the other two alternatives would offer a complete analysis for the NEPA process.

Seasonal closure of trails

We would like to see some of the elements of Alternatives 2 and 3 carried forward to the preferred alternative. The U.S. EPA strongly suggests that Alternative 5 be enhanced to include seasonal trail closures to mountain bicycles and horses during inclement weather for the Charles Deam Wilderness. The advantages of this approach would be two-fold: 1) the public would know what to expect in terms of trail availability; and 2) closures would be helpful in maintaining the trail surface on those trails that have not been hardened or are located in particularly wet or sensitive areas. Trail maintenance is more problematic in the wilderness area because it must be accomplished using primitive means, making maintenance more expensive and difficult.

Increased monitoring

We believe the proposed management activities could be enhanced by including additional monitoring events for species of global concern and invertebrate species, brown-headed cowbirds, and white-tailed deer.

The invertebrate taxa historically do not receive adequate representation in conservation planning largely due to the paucity of data regarding their status (Hoosier-Shawnee Ecological

Assessment, 2004). With a concerted sampling effort, baseline information including distribution and population numbers could be assessed.

Brown-headed cowbirds should be monitored to assess the extent of their effect on the breeding success of Neotropical migratory bird species. Nest parasitism by cowbirds has been shown to be a chief constraint on the breeding success of many Neotropical migrants, effectively causing some breeding areas to become sink populations for certain species because viable populations cannot be maintained with cowbirds present. Because the Forest is one of the last remaining

major tracts of forested habitat in the Midwest, cowbirds' effect on Neotropical migrant breeding success is of particular importance. Consideration should also be given to whether a cowbird trapping program is warranted.

We also recommend the USFS initiate a white-tailed deer study to assess the impacts of the deer herd on forest structure and ecology, particularly under-represented native flora. While we acknowledge that the Indiana Department of Natural Resources (IDNR) establishes target numbers for deer harvests, not the USFS, interaction between the USFS and the IDNR would provide useful information to set harvest targets that would, hopefully, keep the deer population to a size not detrimental to the habitat. In addition, information regarding the interaction that takes place between the USFS and the IDNR on this topic should be included in the FEIS
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We welcome the opportunity to meet with you and your staff to resolve the identified issues and assist the USFS in any way possible between now and the publication of the Final EIS and the Record of Decision. Thank you for your willingness to consider our comments; we hope they will be useful to you. If you have any questions concerning these comments, please contact Kathleen Kowal of my staff at (312) 353-5206.

Sincerely,

/s/ Kenneth A. Westlake 03/28/05

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Science, Ecosystems and Communities

cc: Randy Moore, Regional Forester
Enclosure – Summary of Rating Definitions